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10 Attorneys for Defendant:
CARLOS E. KEPKE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
CARLOS E. KEPKE,
Defendant.

Case No. 3:21-CR-00155-JD

**DECLARATION OF GRANT P. FONDO
IN SUPPORT OF CARLOS KEPKE'S
MOTION *IN LIMINE* NO. 1 TO
EXCLUDE EVIDENCE RELATED TO
ROBERT BROCKMAN'S ALLEGED
TAX FRAUD**

Date: October 17, 2022
Time: 10:30 a.m.
Courtroom: 11, 19th Floor
Judge: Hon. James Donato

DECLARATION OF GRANT P. FONDO

I, Grant P. Fondo, declare as follows:

3 1. I am a partner with the law firm Goodwin Procter LLP and a member of good
4 standing of the bar of this Court. I represent Defendant Carlos E. Kepke (“Mr. Kepke”) in the
5 above-captioned matter. I submit this Declaration in support of Mr. Kepke’s Motion *In Limine* No.
6 1 to Exclude Evidence Related to Robert Brockman’s Alleged Tax Fraud. Unless stated otherwise,
7 this declaration is based on my personal knowledge, and if called as a witness I could and would
8 testify as follows:

9 2. Attached hereto as **Exhibit A** is a true and correct copy of a letter from Michael G.
10 Pitman to Grant P. Fondo dated August 15, 2022.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of a letter from Michael G.
12 Pitman to Grant P. Fondo dated March 10, 2022.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct. Executed on September 30, 2022 in Los Altos, California.

Dated: September 30, 2022

GOODWIN PROCTER LLP

By: /s/ Grant P. Fondo
GRANT P. FONDO (SBN 181530)
GFondo@goodwinlaw.com
GOODWIN PROCTER LLP

Attorneys for Defendant:
CARLOS E. KEPKE

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **September 30, 2022**. I further certify that all participants in the case are registered CM/ ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on
September 30, 2022 in Los Altos, California.

/s/ Grant P. Fondo

GRANT P. FONDO